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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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LEAP SYSTEMS, INC.,

Plaintiff,

—*against*—

MONEYTRAX, INC., ESTATE OF  
NORMAN BAKER and PEGGY BAKER,

Defendants.

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TODD LANGFORD,

Intervenor.

Civil Action No. 05cv1521 (FLW)

**NOTICE OF MOTION/APPEAL**  
**FROM/OBJECTIONS TO**  
**LETTER ORDER OF THE**  
**MAGISTRATE JUDGE DATED**  
**SEPTEMBER 24, 2009**

TO: All Counsel of Record:

**PLEASE TAKE NOTICE**, that Todd Langford will move this Honorable Court, before Hon. Freda L. Wolfson, U.S.D.J., at the United States Courthouse, 402 East State Street, Trenton, New Jersey, on November 2, 2009, at 9:00 AM, or as soon thereafter as counsel may be heard, for an order, pursuant to 28 U.S.C. § 636(b) and L.Civ.R. 72.1(c):

(A) Setting aside the Letter Order of Magistrate Judge Bongiovanni dated September 24, 2009, to the extent the same denied the motion of Intervenor/Movant Todd Langford to vacate or modify this Court's order, dated May 9, 2008, sealing the transcript of the recording of the

settlement agreement among the original parties to the action, which took place on March 25, 2008 (“the Sealing Order”);

(B) Granting Langford’s motion to vacate the Sealing Order; and

(C) Granting Langford such other, further or different relief as to the Court may seem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that in support of this motion/appeal/objections, the movant will rely upon the accompanying Certification of Jeffrey D. Ullman, Esq., dated October 9, 2009, and the supporting Letter Brief submitted simultaneously herewith. Movant has also submitted an proposed form of order.

**PLEASE TAKE FURTHER NOTICE**, that if opposition is presented, the movant respectfully requests oral argument.

Respectfully submitted,

**ULLMAN, FURHMAN & PLATT, P.C.**

By:  \_\_\_\_\_

Jeffrey D. Ullman  
A Member of the Firm

Dated: Morristown, New Jersey  
October 9, 2009